

PI - Identifying Case Issues and the Supporting Codes

Purpose:

To provide instructions for creating and routing codes and issues documents. As potential issues are identified in the review process, the PI Reviewer documents relevant to specific policy and regulatory references.

Identification of Roles:

IME Program Integrity (PI)—ensures correct placement within the directory and facilitates the movement of the case documentation through the approval process.

State Policy Staff- PI will verify with Policy the code to be applied for each of the issues identified

Performance Standard:

None

Path of Business Procedure:

Creating the Codes and Issues Documents

The Reviewer creates the necessary codes and issues documents for each project. Each of the documents is comprised of information used in data fields in the providers' findings letters. The documents are referenced as Parts A, B, and C. Any combination of the documents may be used.

- Step 1. As the Reviewer identifies deficiencies in a project; he or she organizes those deficiencies into "issues" that will be communicated to the provider through a findings letter. The Reviewer enters in the appropriate "codes and issues," or other prepared "issues language."
- a. "Issues" Language—This is a concise statement of the provider's action which is the basis for recoupment. The statement is followed by the cited regulatory reference (such as Iowa Administrative Code or Code of Federal Regulations) and is followed by the actual content of the code.
 1. Use PI form F-304 "Part A—Issue and References" template in the Codes and Issues Directory/Templates Codes and Issues.
 2. Generate one document for each issue.
 3. Save the documents in the Reviewer's electronic Reviews in Process folder (P:PI/Case Files/Reviews in Process/[Reviewer's

Name]/Project Folder/Codes and Issues or Project Name and Number/ [brief description of issue].

Step 2. Concurrently, the Reviewer identifies legal and supplementary references that support the issues. References are researched in the Code of Federal Regulations (CFR), Iowa Code (IC), Iowa Administrative Code (IAC), Medicaid Provider Manuals, provider instruction manuals, informational letters, and coding references (CPT, HCPC and ICD-9). These references are considered the Authority for Recoupment, and are incorporated into the findings letter templates.

a. Authority for Recoupment—Includes all legal and supplementary references used to support the basis for recoupment. The Authority for Recoupment is formatted in a table with two columns.

1. Use PI form F-305 “Part B—Authority for Recoupment” template to create the Authority for Recoupment Table.
2. Enter the references into the Authority for Recoupment Table.
3. Each row of the table correlates with an issue that will be cited in the findings letter.
4. The left column cites the specific legal and supplementary references
5. The right column is a brief description of the reference that is identified in the left column..
6. Enter all legal and supplementary references identified in Part A into the Authority for Recoupment Table.
7. Cite legal and supplementary references once, even if it applies to several issues
8. The Iowa Medicaid Provider’s Manual may be quoted as an additional reference in the Authority for Recoupment Table.
9. Save the Authority for Recoupment document in the Reviewer’s electronic Reviews in Process folder (P:PI/Case Files/Reviews in Process/[Reviewer’s Name]/Project Folder/Codes and Issues or Project Name and Number/Authority for Recoupment.

Step 3. Some deficiencies identified during a review do not indicate an overpayment or recoupment but do indicate that provider education is necessary. Special letter templates have been created to integrate provider education into a findings letter. The Operation Manager or the Account Manager must approve educational issues before the letter is initiated.

a. Educational Issues—This is a concise statement of the provider’s action which is the basis for education. The statement is followed by the cited regulatory reference (such as Iowa Administrative Code or Code

of Federal Regulations) and is followed by the actual content of the code.

1. If educational issues are indicated, utilize PI template F-306 “Part C— Educational Issues” template.
2. Educational issues may be inserted in one document.
3. Use bullet points to list educational issues.
4. Save the Educational Issues document in the Reviewer’s electronic Documents in Process folder (P:PI/Case Files/Reviews in Process/[Reviewer’s Name]/Project Folder/Codes and Issues or Project Name and Number/ Educational Issues.

Routing the Codes and Issues Documents for Approval

- Step 1. Upon completion of codes and issues documents, initiate an electronic Routing Checklist for Codes and Issues F-309.
 - a. Complete the Reviewer section of the document
 - b. Initial and date
 - c. Save in the same folder as the codes and issues documents, naming it “Routing Checklist.”
- Step 2. Reviewer sends an e-mail to the Operations Manager, stating the issues are ready for review and the location of the documents or the link to them The reviewer delivers a paper copy of the legal and supplemental references to the Operations Manager and may keep one set for his/her own use.
- Step 3. While under review, the Operations Manager saves the Codes and Issues folder for each project in P:PI/Case Files/CODES and ISSUES Directory/QA in Process/[Project Name and Number].
- Step 4. The Administrative Assistant formats the documents, reviews for general content and logic, and checks spelling and punctuation, noting any changes through the “track changes” function in Word. Administrative Assistant then notifies the Operation manager by e-mail that the documents are ready for review. The paper copies of the legal and supplemental references cited in the documents are sent to the Operations Manager.
- Step 5. The operation Manager reviews the documents for application and rationale. The Operation Manager discusses all questions and concerns with the Reviewer and works with the Reviewer on any additional resources that would help support the issue. Necessary or recommended changes are made using the “track changes” function in Word. When completed, the Operation

Manager notifies the Account Manager by e-mail. The Operation manager will notify the Reviewer via e-mail when the codes and issues are complete.

Step 6. The Account Manager evaluates for accuracy and completeness of references and quotes using the “track changes” function in Word. When complete, the Account Manager notifies the Administrative Assistant by e-mail.

Step 7. The Operation manager monitors the documents in the QA in Process folder in Codes and Issues periodically throughout the process by evaluating and integrating suggested changes.

Prior to integrating the suggested changes, the Operation manager will print a copy of the codes and issues for the Reviewer.

The Reviewer will review the suggested changes for educational purposes.

Step 8. When the review process is complete, the Operation Manager returns the document(s) into the appropriate Reviewer’s corresponding “Reviews in Process” folder. The Administrative Assistant e-mails the Reviewer and the Operation manager that the routing process is complete and the documents are ready for use.

Step 9. It is essential that any issues have been reviewed and approved. This can be verified by confirming the following actions.

All parties have initialed the router form and any approved revisions were included or accepted.

The folder was removed from QA in Process and into the appropriate Reviewer’s corresponding “Reviews in Process” folder. The Reviewer has received an e-mail stating that the documents are approved for use.

Note: When using “codes issues documents” within a findings letter, there may be multiple issues that cite the same legal and supplemental references used within one letter. Cite the actual issues language once.

Forms/Reports:

[\\dhsime\imeuniversal\Operational Procedures\Program Integrity\Forms and Letters\Approved Forms\Forms\Project Name - 304.doc](#)

[\\dhsime\imeuniversal\Operational Procedures\Program Integrity\Forms and Letters\Approved Forms\Forms\Authority for Exceptions - 305.doc](#)

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<\\dhsime\imeuniversal\Operational Procedures\Program Integrity\Forms and Letters\Approved Forms\Forms\ROUTING CHECKLIST - 309.doc>

RFP References:

6.1.2.2.6

Interfaces:

Program Integrity Unit
State Policy Staff

Attachments:

None